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2 United States Attorney
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11 Attorney for Defendant

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 KAREN N. TORRES,)
15 Plaintiff,) Civil No. 2:16-cv-02088 _____
16 v.)
17 NANCY BERRYHILL,) **DEFENDANT'S UNOPPOSED MOTION**
18 Acting Commissioner of Social Security,) **FOR EXTENSION OF TIME**
19 Defendant.)
_____)

20 Defendant Nancy Berryhill, Acting Commissioner of Social Security ("Defendant")
21 respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm
22 and Response to Plaintiff's Motion for Reversal, due on **September 22, 2017**, by **30 days**, through
23 and including **October 22, 2017**.

24 An extension of time is needed because counsel for Defendant is currently responsible for
25 numerous district court cases at various stages of litigation. Counsel for Defendant is also currently
26 responsible for conducting discovery and preparing substantive motions in personnel-related
27 litigation matters pending before the Equal Employment Opportunity Commission.
28

Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this motion, on September 15, 2017.

Respectfully submitted this 15th day of September 2017.

DANIEL G. BOGDEN
United States Attorney

/s/ Sundeept Patel
SUNDEEP PATEL
Special Assistant United States Attorney

OF COUNSEL:

DEBORAH LEE STACHEL
Acting Regional Chief Counsel, Region IX

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

2/12/2017

DATED: 9/18/2017